

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
(Charlotte Division)

In re:)
) Chapter 7
JTR1, LLC f/d/b/a JTR, LLC)
) Case No. 20-30141
Debtor.)
)
A. Burton Shuford, Trustee of the)
Bankruptcy Estate of JTR1, LLC)
f/d/b/a JTR, LLC,)
)
Plaintiff,)
) Adv. Proc. No. 22-03018
vs.)
)
BJS Insurance, LLC and JJM, LLC,)
)
Defendants.)
)

STIPULATION TO ORDER MEDIATION, DESIGNATE MEDIATOR, AND
DETERMINE SCHEDULING

Plaintiff A. Burton Shuford, Trustee of the Bankruptcy Estate of JTR1, LLC f/d/b/a JTR, LLC (the “Trustee” or “Plaintiff”), jointly with BJS Insurance, LLC and JJM, LLC (collectively, the “Defendants”), by and through counsel, hereby stipulate and agree as follows:

1. It is appropriate to conduct pre-discovery mediation in this case;
2. Steve Gruendel should be appointed the mediator for this action;
3. Mr. Gruendel’s hourly rate for conducting mediation is \$425;
4. Local Rule of Bankruptcy Procedure 9019-2 shall apply to the mediation;
5. The parties intend to hold the mediation in early June 2023, though the specific date

remains to be determined;

6. The parties request that they be allowed to submit a scheduling order following completion of the mediation, for the Court's review, which would govern any remaining issues in the case, including, if not settled, discovery and dispositive motions.

The Parties request that the Court approve the proposal set forth herein.

Dated: May 19, 2023
Charlotte, North Carolina

HAMILTON STEPHENS
STEELE + MARTIN, PLLC

/s/ Melanie D. Johnson Raubach

Melanie D. Johnson Raubach (NC Bar No. 41929)
525 North Tryon Street, Suite 1400
Charlotte, North Carolina 28202
Telephone: (704) 344-1117
Facsimile: (704) 344-1483
mraubach@lawhssm.com
Attorney for Plaintiff

K&L GATES, LLP

/s/ Margaret R. Westbrook

Margaret R. Westbrook (NC Bar No. 23327)
K&L Gates LLP
Post Office Box 17047 (27619-7047)
4350 Lassiter at North Hills Ave., Suite 300
Raleigh, North Carolina 27609
Telephone: (919) 743-7311
Facsimile: (919) 516-2011
E-mail: Margaret.Westbrook@klgates.com
Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this date, copies of the foregoing Stipulation to Order Mediation, Designate Mediator, and Determine Scheduling were served by electronic notification on those parties registered with the United States Bankruptcy Court, Western District of North Carolina ECF system to receive notices for this case.

Dated: May 19, 2023
Charlotte, North Carolina

HAMILTON STEPHENS
STEELE + MARTIN, PLLC

/s/ Melanie D. Johnson Raubach

Melanie D. Johnson Raubach (NC Bar No. 41929)
525 North Tryon Street, Suite 1400
Charlotte, North Carolina 28202
Telephone: (704) 344-1117
Facsimile: (704) 344-1483
mraubach@lawhssm.com
Attorney for Plaintiff